

FILED

DEC 12 2005

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES DISTRICT COURT
DISTRICT OF ALASKA
Deputy

UNITED STATES OF AMERICA,)	A05-0108 CR (JWS)
)	
Plaintiff,)	
)	
VS.)	
)	
CARLOS LEE RAINEY, a/ka Carlos)	
Likee Dishon Johnson-Rainey, "C," and "CJ:")	
SHANNON DAWN RAINEY, a/k/a Shannon)	
Hicks; D'ANDRE TOLBERT a/k/a "Dre;")	
DAMON STEVENS a/k/a "D'Mo;" RICHARD)	
JAMES McKINNON; JOSHUA PRICE PLUID;)	
KRISTA ANN CALLAN; ALEXANDER)	
BOOKER; ALREDO MARTINEZ a/k/a "Spike;")	
FRANCISO MARTINEZ, a/k/a "Money;" and)	
ISAT HERNANDEZ,)	
)	
Defendants.)	RULE 12(b)(4)(B)
)	REQUEST FOR NOTICE

Excludable delay under 18 U.S.C. § 3161(h), delay attributable to filing by defendant, may occur as a result of the filing of the present document or granting of the relief requested.

Defendant Joshua Pluid, by and through undersigned counsel, pursuant to Rule 12(b)(4)(B) Federal Rules of Criminal Procedure, and in order to have the opportunity to move to suppress evidence under Rule 12(b)(3)(c) Fed.R.Crim.P., hereby requests notice of the Government's intent to use (in its evidence-in-chief at trial) any evidence that Mr. Pluid is entitled to discover under Rule 16 Fed.R.Crim.P.

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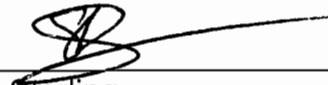
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Sterling & DeArmond
851 E. Westpoint Drive Suite 201 Wasilla, Alaska 99654
(907) 376-8076 www.olsesclawyers.net FAX (907) 376-8078

The present request is authorized under and pursuant to Rule 12(b)(4)(B) Fed.R.Crim.P. Mr. Pluid requests that the Government provide the requested notice as soon as possible due to the relatively short deadline for filing pretrial motions.

DATED this 6th day of Dec., 2005 at Wasilla, Alaska.

Sterling & DeArmond
Counsel for Defendant
Joshua Pluid (D-6)

By: 
Scott A. Sterling

Sterling & DeArmond

851 E. Westpoint Drive Suite 201 Wasilla, Alaska 99654
(907) 376-8076 www.sterlingdearmond.com FAX (907) 376-8078

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served by (United States Mail, first-class, postage prepaid)(~~fax~~)(delivery) on the 7th day of Dec., 2005 upon:

AUSA Stephan Collins
222 West 7th Avenue
Anchorage, Alaska 99513
Fax:: (907) 271-1500
Counsel for Plaintiff

Herman G. Walker, Jr.
606 E Street
Suite 203
Anchorage, Alaska 99501
Fax: (907) 258-4428
Counsel for Defendant Carlos Rainey (D-1)

D. Scott Dattan (*email*)
2600 Denali Street
Suite 460
Anchorage, Alaska 99503
No Fax
Counsel for Defendant Shannon Rainey (D-2)

Burke Wonnell
2600 Denali Street
Suite 460
Anchorage, Alaska 99503
Fax: (907) 278-8571
Counsel for Defendant D'Andre Tolbert (D-3)

Hugh Fleischer
310 K Street
Suite 200
Anchorage, Alaska 99501
Fax: (907) 264-6602
Counsel for Defendant Damon Stevens (D-4)

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Sterling & DeArmond

851 E Westpoint Drive Suite 201
Wasilla, Alaska 99654
(907) 376-8076 www.dlsclawyers.net FAX (907) 376-8078

AFD Mike Dieni
550 West 7th Avenue
Suite 1600
Anchorage, Alaska 99501
Fax: (907) 646-3480
Counsel for Defendant Richard McKinnon (D-5)

Lance Wells
733 West 4th Avenue
Suite 308
Anchorage, Alaska 99501
Fax: (907) 277-9859
Counsel for Defendant Krista Callan (D-7)

John Pharr
733 West 4th Avenue
Suite 308
Anchorage, Alaska 99501
Fax: (907) 277-9859
Counsel for Defendant Alexander Booker (D-8)

By: 

Sterling & DeArmond

851 E. Westpoint Drive Suite 201 Wasilla, Alaska 99654
(907) 376-8076 www.dcsdallawyers.net FAX (907) 376-8078